

GENERAL GUIDANCE FOR RISK MANAGEMENT PROGRAMS (40 CFR PART 68)



This document provides guidance to help owners and operators of stationary sources to determine if their processes are subject to regulation under section 112(r) of the Clean Air Act and 40 CFR part 68 and to comply with regulations. This document does not substitute for EPA's regulations, nor is it a regulation itself. Thus, it cannot impose legally binding requirements on EPA, states, or the regulated community, and may not apply to a particular situation based upon circumstances. This guidance does not represent final agency action, and EPA may change it in the future, as appropriate.

TABLE OF CONTENTS

	<u>Pa</u>	age
INTRODUCT	TION	i
CHAPTER 1:	GENERAL APPLICABILITY	1-1
1.1	INTRODUCTION	1 1
1.1	GENERAL PROVISIONS	
1.3	REGULATED SUBSTANCES AND THRESHOLDS (§68.130)	
1.4	WHAT IS A PROCESS	
1.5	THRESHOLD QUANTITY IN A PROCESS	
1.6	STATIONARY SOURCE	
1.7	WHEN YOU MUST COMPLY	
CHAPTER 2:	APPLICABILITY OF PROGRAM LEVELS	2-1
2.1	WHAT ARE PROGRAM LEVELS?	2.1
2.1	PROGRAM 1	
2.2	QUICK RULES FOR DETERMINING PROGRAM 1 ELIGIBILITY	
2.3	PROGRAM 3	
2.4	PROGRAM 2	
2.6	DEALING WITH PROGRAM LEVELS	
2.7	SUMMARY OF PROGRAM REQUIREMENTS	
2.8	EXAMPLE SOURCES	
CHAPTER 3:	FIVE-YEAR ACCIDENT HISTORY	3-1
2.1	WHAT ACCIDENTS MUST BE DEPORTED.	2.1
3.1 3.2	WHAT ACCIDENTS MUST BE REPORTED?	
3.3	OTHER ACCIDENT REPORTING REQUIREMENTS	
	•	
CHAPTER 4:	OFFSITE CONSEQUENCE ANALYSIS	4-1
4.1	INTRODUCTION	4-1
4.2	WORST-CASE RELEASE SCENARIOS	
4.3	ALTERNATIVE RELEASE SCENARIOS	. 4-11
4.4	ESTIMATING OFFSITE RECEPTORS	. 4-19
CHAPTER 5:	MANAGEMENT SYSTEM	5-1
5.1	GENERAL INFORMATION	5-1
5.2	HOW TO MEET THE MANAGEMENT SYSTEM REQUIREMENTS	5-1

TABLE OF CONTENTS

(Continued)

	<u>rage</u>
CHAPTER 6:	PREVENTION PROGRAM (PROGRAM 2) 6-1
6.1	ABOUT THE PROGRAM 2 PREVENTION PROGRAM
6.2	SAFETY INFORMATION (§ 68.48)
6.3	HAZARD REVIEW (§ 68.50)
6.4	OPERATING PROCEDURES (§ 68.52)
6.5	TRAINING (§ 68.54)
6.6	MAINTENANCE (§ 68.56)
6.7	COMPLIANCE AUDITS (§ 68.58)
6.8	INCIDENT INVESTIGATION (§ 68.60)
6.9	CONCLUSION
CHAPTER 7:	PREVENTION PROGRAM (PROGRAM 3)
7.1	PROGRAM 3 PREVENTION PROGRAM AND OSHA PSM
7.2	PROCESS SAFETY INFORMATION (§68.65)
7.3	PROCESS HAZARD ANALYSIS (§68.67)
7.4	OPERATING PROCEDURES (§68.69)
7.5	TRAINING (§68.71)
7.6	MECHANICAL INTEGRITY (§68.73)
7.7	MANAGEMENT OF CHANGE (§68.75)
7.8	PRE-STARTUP REVIEW (§68.77)
7.9	COMPLIANCE AUDITS (§68.79)
7.10	INCIDENT INVESTIGATION (§68.81)
7.11	EMPLOYEE PARTICIPATION (§68.83)
7.12	HOT WORK PERMITS (§68.85)
7.13	CONTRACTORS (§68.87)
	APPENDIX 7A PHA TECHNIQUES
CHAPTER 8:	EMERGENCY RESPONSE PROGRAM
8.1	NON-RESPONDING FACILITIES (§ 68.90(b))
8.2	ELEMENTS OF AN EMERGENCY RESPONSE PROGRAM (§ 68.95) 8-2
8.3	DEVELOPING AN EMERGENCY RESPONSE PROGRAM
8.4	INTEGRATION OF EXISTING PROGRAMS
8.5	HAVE I MET PART 68 REQUIREMENTS? 8-11
8.6	COORDINATION WITH LOCAL EMERGENCY PLANNING ENTITIES
	(§ 68.95(c))

TABLE OF CONTENTS

(Continued)

		<u>Page</u>
СНАР	TER 9:	RISK MANAGEMENT PLAN9-1
	9.1	ELEMENTS OF THE RMP
	9.2	RMP SUBMISSION 9-2
	9.3	ISSUES PERTAINING TO SUBMISSIONS OF AND ACCESS TO CLASSIFIED,
		CONFIDENTIAL BUSINESS INFORMATION (CBI), AND TRADE SECRETS 9-3
	9.4	RESUBMISSION AND UPDATES (§ 68.190)
СНАР	TER 10:	: IMPLEMENTATION
	10.1	IMPLEMENTING AGENCY
	10.2	REVIEWS/AUDITS/INSPECTIONS (§ 68.220)
	10.3	RELATIONSHIP WITH TITLE V PERMIT PROGRAMS 10-4
	10.4	PENALTIES FOR NON-COMPLIANCE
СНАР	TER 11:	COMMUNICATION WITH THE PUBLIC
	11.1	BASIC RULES OF RISK COMMUNICATION
	11.2	SAMPLE QUESTIONS FOR COMMUNICATING WITH THE PUBLIC 11-4
	11.3	COMMUNICATION ACTIVITIES AND TECHNIQUES
	11.4	FOR MORE INFORMATION

APPENDICES

APPENDIX A	40 CFR PART 68 (1997 edition)
APPENDIX B	SELECTED NAICS CODES
APPENDIX C	EPA REGIONAL CONTACTS
APPENDIX D	OSHA CONTACTS
APPENDIX E	TECHNICAL ASSISTANCE

LIST OF EXHIBITS

CHAPTER 1 EXHIBIT 1-1 EXHIBIT 1-2	
EXHIBIT 1-3	STATIONARY SOURCE
	PROGRAM LEVEL CRITERIA
	COMPARISON OF PROGRAM REQUIREMENTS
CHAPTER 3 EXHIBIT 3-1	ATMOSPHERIC STABILITY CLASSES
CHAPTER 4	
EXHIBIT 4-1	CONSIDERATIONS FOR CHOOSING A MODELING METHOD
EXHIBIT 4-2	POSSIBLE SOURCES OF ASSISTANCE ON MODELING
EXHIBIT 4-3	REQUIRED PARAMETERS FOR MODELING WORST-CASE SCENARIOS
EXHIBIT 4-4	REQUIRED PARAMETERS FOR MODELING ALTERNATIVE SCENARIOS
CHAPTER 5	
EXHIBIT 5-1	SAMPLE MANAGEMENT DOCUMENTATION
CHAPTER 6	
EXHIBIT 6-1	SUMMARY OF PROGRAM 2 PREVENTION PROGRAM
EXHIBIT 6-2	SAFETY INFORMATION REQUIREMENTS
EXHIBIT 6-3	CODES AND STANDARDS
EXHIBIT 6-4	
EXHIBIT 6-5	HAZARD REVIEW REQUIREMENTS
EXHIBIT 6-6 EXHIBIT 6-7	SAMPLE CHECKLIST (EXTRACT) OPERATING PROCEDURES REQUIREMENTS
EXHIBIT 6-8	
	MAINTENANCE GUIDELINES
	SAMPLE AUDIT CHECKLIST FOR SAFETY INFORMATION AND HAZARD
	REVIEW
	INCIDENT INVESTIGATION REQUIREMENTS
EXHIBIT 6-12	2 SAMPLE INCIDENT INVESTIGATION FORMAT
CHAPTER 7	
EXHIBIT 7-1	COMPARABLE EPA AND OSHA TERMS
EXHIBIT 7-2	SUMMARY OF PROGRAM 3 PREVENTION PROGRAM
EXHIBIT 7-3	· ·
EXHIBIT 7-4	
EXHIBIT 7-5	OPERATING PROCEDURES REQUIREMENTS
EXHIBIT 7-6 EXHIBIT 7-7	MECHANICAL INTEGRITY CHART MANAGEMENT OF CHANGE REQUIREMENTS
EXHIBIT 7-7	
EXHIBIT 7-8	-
	FMPLOVEE PARTICIPATION REQUIREMENTS

EXHIBIT 7-11 HOT WORK PERMITS REQUIREMENTS

(Continued)

	EXHIBIT 7-1	12 C	ONTRA	CTORS	CHART
--	-------------	------	-------	-------	-------

EXHIBIT 7A-1 APPLICABILITY OF PHA TECHNIQUES

EXHIBIT 7A-2 TIME AND STAFFING FOR PHA TECHNIQUES

CHAPTER 8

EXHIBIT 8-1 FEDE	RAL GUIDANCE ON	N EMERGENCY PL	ANNING AND RESPONSE
------------------	-----------------	----------------	---------------------

EXHIBIT 8-2 FEDERAL EMERGENCY PLANNING REGULATIONS

EXHIBIT 8-3 INTEGRATED CONTINGENCY PLAN OUTLINE

EXHIBIT 8-4 SAMPLE INTEGRATION EFFORT

CHAPTER 9

EXHIBIT 9-1 RMP UPDATES

CHAPTER 11

EXHIBIT 11-1 SEVEN CARDINAL RULES OF RISK COMMUNICATION

(Continued)

LIST OF BOXES

INTRODUCTION

GUIDANCE FOR INDUSTRY-SPECIFIC RISK MANAGEMENT PROGRAMS STATE PROGRAMS
IF YOU ARE NEW TO REGULATIONS
WHAT IS A LOCAL EMERGENCY PLANNING COMMITTEE?

CHAPTER 1

STATE PROGRAMS

Qs AND As: STATIONARY SOURCE AGGREGATION OF SUBSTANCES

Os AND As: PROCESS

Qs AND As: STATIONARY SOURCE Qs AND As: COMPLIANCE DATES

CHAPTER 2

Qs AND As: PROCESS AND PROGRAM LEVEL

Qs AND As: PUBLIC RECEPTORS

Qs AND As: ENVIRONMENTAL RECEPTORS

Qs AND As: ACCIDENT HISTORY

Qs AND As: OSHA

CHAPTER 3

Qs AND As: PROPERTY DAMAGE Qs AND As: ACCIDENT HISTORY

CHAPTER 4

RMP OFFSITE CONSEQUENCE ANALYSIS GUIDANCE OS AND AS: WORST-CASE AND MITIGATION

HOW TO OBTAIN CENSUS DATA AND LANDVIEW

HOW TO OBTAIN USGS MAPS

Qs AND As: OFFSITE CONSEQUENCE ANALYSIS

CHAPTER 6

Q AND A: MAINTENANCE

Q AND A: AUDITS

CHAPTER 7

Qs AND As: IMPLEMENTATION AND PROGRAM LEVEL

Qs AND As: PROCESS SAFETY INFORMATION

Qs AND As: OFFSITE CONSEQUENCES

(Continued)

CHAPTER 8

WHAT IS A RESPONSE
WHAT IS A LOCAL EMERGENCY PLANNING COMMITTEE?
HOW DOES THE EMERGENCY RESPONSE PROGRAM APPLY?
PLANNING FOR FLAMMABLE SUBSTANCES

CHAPTER 9

Q AND A: REVISING A PHA

CHAPTER 10

Qs AND As: DELEGATION Qs AND As: AUDITS

CHAPTER 11

WHAT DOES YOUR WORST-CASE DISTANCE MEAN?

IF THERE IS AN ACCIDENT, WILL EVERYONE WITHIN THAT DISTANCE BE HURT? WHAT ABOUT PROPERTY DAMAGE?

WHY DO YOU NEED TO STORE SO MUCH ON SITE?

WHAT ARE YOU DOING TO PREVENT RELEASES?

WHAT ARE YOU DOING TO PREPARE FOR RELEASES?

DO YOU NEED TO USE THIS CHEMICAL?

WHY ARE YOUR DISTANCES DIFFERENT FROM THE DISTANCES IN THE EPA LOOKUP TABLES?

HOW LIKELY ARE THE WORST-CASE AND ALTERNATIVE RELEASE SCENARIOS?

IS THE WORST-CASE RELEASE YOU REPORTED REALLY THE WORST ACCIDENT YOU CAN HAVE?

WHAT ABOUT THE ACCIDENT AT THE [NAME OF SIMILAR FACILITY] THAT HAPPENED LAST MONTH?

WHAT ACTIONS HAVE YOU TAKEN TO INVOLVE THE COMMUNITY IN YOUR ACCIDENT PREVENTION AND EMERGENCY PLANNING EFFORTS?

CAN WE SEE THE DOCUMENTATION YOU KEEP ON SITE?